

LAW OFFICES OF JANE BECKER WHITAKER
PO BOX 9023914
SAN JUAN, PUERTO RICO 00902-3914
787 754-9191
787 764-3101

janebeckerwhitaker@gmail.com
janebeckerwhitaker@yahoo.com

Of Counsel
A.J. Bennazar

416 Ponce de León Ave.
Hato Rey, PR 00918

September 9, 2015

Hon. Loretta A. Preska
United States District Judge
Southern District of New York
500 Pearl Street, Room 2220
New York, NY 10007

Re: *United States ex rel. New York ex rel. Rold v. Raff & Becker, LLP, et al.*
14 Civ. 4393 (LAP)(HP)

Dear Judge Preska:

I write to request that the oral argument scheduled in the instant case for October 22 be adjourned to the last week of October or the first week of November. I have asked opposing counsel whether they consent to the adjournment, and they do, noting that they are all available on October 28, 29, 30 and November 2-5.

I seek the continuance because on October 22 I have a meeting scheduled outside of Puerto Rico with co-counsel from three different states to address how the looming default of the Puerto Rico government in general and the Puerto Rico Electric Power Authority (PREPA) in particular affects litigation involving PREPA as well as multiple co-defendants. I cannot move the meeting up because I have a federal mediation in Puerto Rico on October 20 in 13-1844 (PAD).

In 2011, plaintiff relator filed this *qui tam*/civil rights case in which the former Chief Judge of the New York Unemployment Board challenges: (1) the collusive diversion of taxpayer money from the unemployment benefits program in New York and payment of millions of dollars of attorneys' fees to class counsel without scrutiny; and (2) his termination as Chief Judge for blowing the whistle on the activity.

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Defendants requested oral argument when they filed their Motions to Dismiss on February 28, 2014 before the Hon. Dora Irizarry before the case was transferred to this district. The Motion to Dismiss has been submitted since October 16, 2014. No party has sought any prior request for adjournment as to oral argument of defendants' Motions to Dismiss.

Respectfully submitted,

/s/Jane Becker 6155

Jane Becker

cc: All counsel of record (via ecf)